

2020

# St. Colman's Community College, Midleton. Special Educational Needs Policy



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## Special Education Needs Mission Statement

Our aim in St Colman' Community College is to create a school where each person is respected, valued and supported. The college has a caring and committed staff and our philosophy is one of inclusiveness. We respect diversity, parental choice and equality

It is our hope that our school is a place where we promote and facilitate a whole-school approach to special needs education and so create a community of learning. We recognise each pupil as a unique individual with different talents and needs. We endeavour to meet their physical, intellectual and emotional needs through our student-focused programmes. By adopting an holistic approach to education we hope to nurture each individual student's personal growth and development. We promote independence in our students and strive to enable all to achieve their full potential.

In St Colman's Community College we offer an inclusive curriculum, which is relevant, realistic and co-operative, and we do so in active partnership with pupils, parents and staff. The school shall respond to the needs of our students irrespective of gender, family status, sexual orientation, religion, disability, membership of the traveller community or race.

## Aims of the Policy

The purpose of this policy is to provide practical guidance for teachers, pupils and parents/guardians on the provision of SET(Special Education Teaching) in St Colmans Community College. Circular 0014/2014 'Special Education Teaching Allocation' introduced a revised model for allocating Special Education Need Resources (SEN) to schools from September 2017. This document and the 'Guidelines for Post-Primary Schools Supporting Students in Mainstream Schools', produced by the DES in May 2017 are now the guiding principles that form the basis for support for students with SEN in our school.

St Colman's Community College has been allocated a specific number of additional teaching support hours by the DES, to cater for all students with an identified special educational need. These hours are to be used to provide support, based on the principles laid down in the above documentation so that the students with the greatest need have access to the greatest level of support. This has been our normal practice to date. The school also has two classes in its ASD programme.

Within the SEN department students are provided with support based on their individualised needs. This support will be based on the Continuum of Support Framework set out by the Department(see appendix 1) which "recognises that special educational needs occur along a continuum, ranging from mild to severe, and from transient to long term", so that students will "require different levels of support depending on their identified need" (DES, May 2017, pg6).

In making provision for special need students the school needs to know whether the incoming student has had access to any of the following resources:

- Special Needs Assistant
- A Special Class , Help for specific needs, support from a SET Teacher
- Assistance with behavioural modification
- Psychological, Occupational Therapy, Speech and Language assessment - report to be provided.
- Any additional resources to help with their special needs

- Help in areas including visual impairment, hearing impairment, general learning disability or emotional disturbance
- Any resource in relation to travel or mobility, etc.

Other resources not listed above.

Parents are strongly advised to inform the school as early as possible and discuss their particular situation well in advance of their child's commencement in first year. If an application for SNA support is required parents must advise the school of this when they accept a place in the school. N.B. The school will use the resources provided by the Department of Education and Skills to make reasonable provision and accommodation for students with disabilities or special educational need

This document is intended to build on existing good practice in our school and to complement the advice given in Inclusion of Students with Special Educational Needs: Post-Primary Guidelines (DES, 2007).

## Values

In St. Colmans Community College, we are committed to ensuring that students with SEN make maximum progress.

We believe that all students:

- Are of equal value;
- Are able to make a valuable contribution to the life of the school;
- Should have equal educational opportunities;
- Should be educated in a climate of high expectation, cooperation and collaboration;
- Should be integrated and participate fully in school life;
- Have the right to be treated with sensitivity, consideration and respect in a safe environment.

We believe that : "All teachers are teachers of Special Needs" and have a responsibility to identify, respond and ensure high quality provision in the education and welfare of all students with Special Educational Needs to overcome barriers to learning, provide suitable learning challenges and accommodate a diversity of student needs. All teachers are responsible for providing quality teaching, differentiating to meet student needs and monitoring students against SEN targets.

## Provision of Support

**The following criteria can be used to identify students who may benefit from extra supports:**

1. School links with primary schools.
2. Meetings with parents/guardians of incoming students.
4. Primary school passport documentation.
5. Testing, Entrance tests, Maths/English screening test.
6. Referrals from teachers to SEN team or SEN coordinator.
7. Educational reports presented to school.
8. Analysis of in house exams versus CAT test or other aptitude test.
9. Meeting with NEPS
10. Information from CAMS or other outside agencies if available
11. Meeting with the S.E.N.O

Students who are in receipt of SEN support hours may need to be assessed in school by the SEN team for the purposes of determining how best to support their individual learning needs. These assessments will consist of both formal and informal assessments. Formal assessment will include but may not be limited to the Diagnostic Reading Analysis, NGRT, CAT4, WIAT 3 and oral language assessment. Informal assessment will include but will not be limited to; writing samples, maths samples, learning style and in class observations. *All assessment results are private and confidential to each student and their parents/guardians.*

## Models of SEN Provision

The subject teacher has been explicitly recognised as having the primary responsibility for the progress and care of all students in their classroom in the DES Circular 0014/2017 and the Post Primary Guidelines. As this specifically includes students with educational needs, collaboration

between the SEN department staff and subject departments is invaluable in supporting these students. This framework helps us implement a staged approach to ensure that our support and interventions are incremental, moving from class-based interventions to more intensive and individualised support. The supports and interventions are informed by careful monitoring of progress. We aim to strike a balance between in-class support, group and individual support while ensuring that students' needs are met inclusively.

There are *three levels* of support:

#### **Level One:**

*SUPPORT FOR ALL:* Whole school and Classroom support. The school engages with programmes in Numeracy, Literacy and Social/Emotional domains to promote early intervention and seek to provide a response to such intervention if necessary.

#### **Level Two:**

*SUPPORT FOR SOME:* school support for small groups and some individuals on a weekly timetabled basis or short-term intervention. Such support may include (but is not limited to) 'Team Teaching' which is used to support students in timetabled class groups in a learning environment where 'two or more teachers work together in a collaborative manner with a class of students who have diverse learning needs' (SEN Post Primary Guidelines) or through group or individual support within the classroom setting or, through a combination of these modes of intervention.

#### **Level Three:**

*SUPPORT FOR A FEW:* This will provide individualised and specialised support for a number of students on a regular timetabled basis. Individual SEN support timetables are issued to those students who fall under levels 2 and 3 of the Continuum of Support.

In assessing and deciding which students need to be in receipt of supplementary teaching and which students may benefit from support within the mainstream context the following options are considered:

Individual Withdrawal is rare and is used only where a student requires specialised individual support.

Small Group Withdrawal is the preferred method of provision at level 3, with most students at this level getting their allocation in small groups. The organisation of these groupings is the job of the Special Needs Coordinator, in consultation with the Deputy Principal. Groups are arranged on the basis of similar need profiles and the capacity to withdraw students at the same time. Withdrawal for small groups usually occurs during Irish for those students who are **exempt** and during continental language classes for those not doing a language.

**Organisation and Life/social Skills** lessons may form part of a programme for some

students.

Resources are allocated based on need – **students with the highest level of need have access to the greatest resources.**

### **Reduced Timetable**

A student with SEN who experiences severe difficulty in coping with the breadth of the current curriculum is permitted to 'drop' a subject. This is **rare** and occurs only after all avenues have been exhausted. A consultation between the parents/ guardian and guidance teacher is also necessary. Parents must sign a consent form giving permission for a reduced subject load.

The period of intervention recommended for each student is dependent on the nature and extent of their individual need. The duration of provision is varied and is reviewed throughout the intervention. There are cases where support is needed on a short-term basis, after which the student is in a position to recommence with the regular curriculum. All decisions in this regard are discussed with parents/guardians, class teachers, the student, principal and guidance counsellor.

### **English as an Additional Language (EAL) Students**

The term EAL is used when referring to pupils where the mother language at home is not English. In St Colmans Community College, we are committed to providing appropriate provision of teaching and resources for pupils for whom English is an additional language and for raising the achievement of all pupils. The aim of our EAL provision will be to successfully bridge any gap in fluency of English between children for whom English is the language of communication in all spheres of their life and those children for whom English is simply one of the languages of communication in their lives.

#### **Aims:**

- To ensure that we meet the full range of needs of those children who are learning English as an additional language;
- To welcome and value the cultural, linguistic and educational experiences that pupils with EAL bring to the School;
- To help EAL pupils to become confident and fluent in speaking and listening, reading and writing in English in order to be able to fulfil their academic potential;
- Recognise and encourage the talents and skills they bring to the school;

- Support EAL learners in accessing and engaging with the Curriculum;
- To encourage and enable parental support in improving children's attainment;
- To be able to assess the skills and needs of pupils with EAL and to give appropriate provision throughout the School;
- To maintain pupils' self-esteem and confidence by acknowledging and giving status to their skills in their own languages.

### Support Available

- Upon entry to the school, EAL students' proficiency of English will be assessed. Appropriate strategies and information will be shared with staff.
- If deemed necessary, an appropriate level of Support will be offered to the student including withdrawal to work with EAL teacher/ Support staff and in class Support.
- Staff are committed to ensuring classrooms are socially and intellectually inclusive, valuing cultural differences and fostering a range of individual identities.
- Staff strive to identify the student's strengths and encourage them to transfer their knowledge, skills and understanding of one language to another.
- Staff recognise that EAL students will need more time to process and answer both orally and in written format.
- Irish Exemptions are issued

### Exemptions from Irish

- Incoming first years with Irish exemptions are noted.
- **Certificates of exemption** from the study of Irish must be submitted with the enrolment application.
- The school will only consider granting an exemption for Irish when a written request is made by the student's parents and where the strict criteria laid down by the department are met

- The guidelines set down by the Department of Education and Science will be **strictly** adhered to (Revised Circular 0053/2019).  
[http://www.education.ie/en/Circulars-and-Forms/ActiveCirculars/ppc10\\_94.pdf](http://www.education.ie/en/Circulars-and-Forms/ActiveCirculars/ppc10_94.pdf)
- Where possible, withdrawal for SET is arranged for students with SEN, who do not study Irish, during Irish time. They must have an official Irish exemption. This is not guaranteed and is limited by timetable restrictions and staff availability.
- Applications for Irish exemptions on the grounds of SEN are made by the SEN Coordinator and signed by the Principal

## Meeting the needs of Students - Roles and Responsibilities

Effective teaching and learning is critically important for all students, and especially for those with special educational needs. Meaningful inclusion implies that all students are taught in stimulating and supportive classroom environments where they are respected and valued.

### **Role of the subject teacher:**

The classroom teacher is responsible for educating all students in his/her class, including any student with a special educational need. The class teacher has primary responsibility for the progress and care of all students in his/her classroom, including students with special educational needs.

It is the responsibility of the classroom teacher to ensure that each student is taught in a stimulating and supportive classroom environment where all students feel equal and valued. Subject teachers are required to plan their lessons carefully to address the diverse needs within the classroom.

In line with the Continuum of Support Guidelines, the class teacher may gather information through formal and informal means, with a view to informing interventions. The classroom teacher also has a central role in identifying and responding to students with additional needs, including differentiating the curriculum as appropriate. These responses will be informed and assisted by collaboration with the SEN department, parents/guardians and others such as the school's NEPS psychologist, and the local Special Educational Needs Organiser (SENO).

The classroom teacher will also make specific accommodations for students within the class as a result of concerns about a student's progress, application, communication, behaviour or interaction with peers and the development of a programme of differentiated instruction for that student.

All subject teachers are required to implement teaching approaches and methodologies that facilitate the meaningful inclusion of students with special educational needs. Each subject department will include in its plan how it caters for the different students taking their subject. These methodologies include:

- Co-operative teaching and learning within mainstream classrooms
- Collaborative problem-solving activities
- Heterogenous group work
- Differentiation\*
- Interventions to promote social and emotional competence
- Embedding of Information and Communications Technology (ICT) in teaching, learning and assessment

*\*Differentiation can be achieved by:*

- Varying the level, structure, mode of instruction and pace of lessons to meet individual needs
- Adapting lessons for students' interests
- Matching tasks and processes to students' abilities and needs
- Adapting and utilising resources, including use of technology
- Aspiring towards suitably challenging learning outcomes and assessing accordingly

Every student should be taught a curriculum that is appropriate to his/her developmental level. In matching programmes to students' needs, management will look at the range of curriculum options available, including Junior Certificate Schools Programme, Junior Cycle Level 2 Learning Programmes(L2LP) and Leaving Certificate Applied Programme.

### **Role of the school principal**

The principal has overall responsibility for ensuring that the special educational needs of students are met. The principal takes general responsibility for establishing and promoting school-wide policies and procedures which support the learning of all students including those with special needs. In particular the principal will:

- Oversee a school-wide approach to assessment and screening to identify needs and to allocate resources

- Engage with feeder primary schools to support the transition of students with special educational needs
- In collaboration with the in-school management team, deploy staff, allocate resources, organise students and timetable
- Ensure an efficient system of sharing information of students' needs with subject teachers is in place
- Facilitate continuing professional development of all teachers in relation to the education of students with special educational needs ensuring also that all school staff understand their roles and responsibilities in this area.
- Form a special education needs team (SEN team) to coordinate the provision of special education in the school.
- Delegate the performance of specific responsibilities to other staff members including the SEN team

### **Role of the Board of Management**

- To ensure that a policy is in place and that it is reviewed regularly.
- To make recommendations for improvement where appropriate.
- To ensure that the school meets its requirements in relation to inclusion under the Education Act (1998) and CL 0014/2017-Special Education Teaching Allocation.

### **Role of the SEN Department**

- To identify and assess students needs as early as possible (ideally during 6th Class through effective primary liaison);
- To ensure full entitlement and access for students with SEN to a broad and relevant curriculum;
- To work in partnership with parents, students and external agencies to ensure students with SEN are able to reach their full potential;
- To prepare Student Support files for students with high priority of needs;
- To regularly review the SEN Register;
- To regularly review interventions and assess their impact upon students' progress;
- To keep teaching staff fully informed of individual needs and to advise on appropriate strategies;

- To provide individual/small group support where necessary to help in the raising of literacy/numeracy skills;
- To provide a safe and secure environment for students so that they participate in their learning and increase their responsibility for their learning and behaviour as they move through school;
- To effectively deploy SNAs and develop skills and qualities;
- To have an integrated approach with the Student Support Team.

The SEN team/coordinator will work closely with the principal, subject teachers, parents, the guidance counsellor, the pastoral care/discipline team and other support structures within the school. Members of the team will provide support to subject teachers to meet students' needs within their classroom and subject areas.

### **Role of the Guidance Counsellor(s)**

- To work with the Special Needs Team and other staff in the implementation and review of this policy.
- To liaise on an ongoing basis with the other members of the S.E.N. Team and Pastoral Care Team as relevant matters arise.
- To provide a range of services to all students, including careers information, study skills and examination techniques, consultation with parents, referral services etc. with an awareness of the S.E.N. of students.
- To work together with the S.E.N. Team to conduct assessments of incoming first years and other students new to the school.
- To advise the Principal of any matters arising from such assessments.
- To support students who have been referred.
- To advise on supports available at third level for S.E.N. students e.g. RACE, DARE) and to assist students in accessing these supports.
- To act as an advocate for the S.E.N. student ensuring that her/his voice is heard when decisions concerning S.E.N. are being made.

## **Role of the SET Teachers**

SET teachers are expected to familiarise themselves with a wide range of teaching approaches, methodologies and resources to cater for particular learning styles and a variety of needs. They are required:

- To teach individual and small groups of students requiring learning support.
- To liaise with the S.E.N. team in the development of learning programmes for these students.
- To liaise with subject teachers and other departments on employing differentiated teaching methods and resources in their subject teaching.

## **Role of the Special Needs Assistants**

- To carry out duties as assigned by the Principal in accordance with Circular 10/76. To cater for the care needs of the S.E.N. Students including assistance with clothing, feeding, toileting and general hygiene.
- To provide special assistance where necessary for students with particular difficulties e.g. writing, typing, photocopying etc.
- To provide assistance on out-of-school activities as may be required.
- To assist in the organisation and procurement of items needed for class e.g. textbooks, P.E. gear etc. and in the organisation of the student's locker.
- To assist the teachers in the supervision of pupils with special needs during assembly, recreational and dispersal periods.
- To encourage each pupil to become more independent and self-reliant.

## **Early intervention and prevention**

Early-intervention programmes, which are evidence-based and are responsive to the school's context will be used. Focused interventions to develop literacy, social, emotional, life-skills and well-being are particularly important for junior cycle students with special educational needs.

The school uses 'Effective Interventions for Struggling Readers', NEPS 'Friends' programme, NBSS transition and transfer programme, NBSS Alert training, SESS Pathways to Prevention.

All intervention programmes are monitored to assess and record their impact on student progress and participation in learning and in school life.

Our Pastoral/Behavioural Support Team and the SEN team serves an important preventative and early intervention function, particularly in addressing the needs of students with social, emotional, behavioural and well-being needs. This team provides a forum to share concerns and to work towards solutions. It plays an important coordinating role and facilitates monitoring and review of students' progress.

## Behaviour for Learning Programme (Support for some/level 3)

Students who are offered Level 3 support may present with a variety of challenging behaviours, including difficulties with social skills, low self-esteem, difficulties forming and maintaining relations with adults and/or peers. The programme also aims to help students improve their concentration and attention across all subject areas. The Behaviour for Learning Programme is an evidenced programme run by the NBSS, now the NCSE. Students are seen on an individual basis two/three times per week with increased support if necessary.

Additionally, the Behaviour for Learning Programme facilitates the planning, implementation and evaluation of effective responses to challenging behaviour at small group level. This is Level 2: target support for some students

The teacher works with identified students individually or in small groups on Behaviour for Learning Programmes that are designed to meet their social, emotional, well being, behavioural and academic needs, so they can achieve and succeed in school.

Some of the programmes we offer

- Getting it Together ( NBSS Organisational Skills Programme)
- Retracking Programme
- Role Play (Talking through an incident/what would we have done differently)
- Why Try Programme
- Keep It Kool Programme
- Crucial Skills Programme-Anger Management for teenagers
- Why Try Programme
- Literacy programmes such as Toe by Toe, SNIP, Dolch Lists etc
- Stop Think and Do
- Taming Anger (NBSS)
- Hot to Cold (NBSS)

## SCP Policy on Access for SEN Students

The School Completion Programme provides in-school, after-school and holiday support and activities for young people who are at risk of leaving school early. SCP aims to improve these students' attachment to education and relationship with their school. There are strict criteria for entry to the School Completion Programme based on in-school behaviour and attendance records. SEN students who are deemed eligible for SCP may not receive a place if they are deemed to have sufficient support within the SEN department. Efforts are made to prevent duplication of supports. SEN students may be referred as brief participants and can therefore take part in time limited programmes which enhance peer relationships and reduce risk-taking behaviours. Universal supports, such as homework clubs, social clubs and breakfast clubs are available to all students and SEN students are encouraged to take part in these.

## Target Setting

Good target-setting is central to effective teaching and learning for students with special educational needs. Targets are: linked to assessment; strengths-based; linked to interventions and developed collaboratively.

Targets are based on the evidence collected through both formal and informal assessment approaches. Parents are consulted when setting targets and reviewing progress. The views of students may be included in this process through direct involvement in the discussions or by gathering their views in advance of the review process. Targets will be measurable and observable and will reflect the specific special educational need of individual students. Targets will be achievable within a specified time frame, they will also challenge and build on existing knowledge and address students' holistic needs.

## Monitoring, and recording outcomes

A whole school approach to the monitoring and recording of programmes will be led by Management and SEN coordinator. Students' progress in relation to achieving their targets should be regularly and carefully monitored. This stage of the process is informed by effective measurement of baseline performance, including the use of criterion-referenced tests and other methods of assessment (for example, teacher-designed tests, checklists, samples of work, observation and reports from subject teachers, class tutors and year heads) that allow students to demonstrate their progress. This should lead to the establishment of specific targets to be achieved within a defined timeframe, as outlined below.

Monitoring outcomes is part of a dynamic process of identification, target-setting, intervention review, which in turn should lead to adjustments in support plans. The Student Support File (NEPS) provides schools with a useful resource to support and record this process. It includes a Support Review Record to guide teachers when monitoring progress and reviewing outcomes

with parents and students. Such monitoring of progress, and subsequent adaptation of support plans, are key drivers of effective practice.

In addition to monitoring outcomes at the individual level, it is also important to review outcomes at group, class and whole-school level. This review could include measures of attainment, communication, independence, attendance, social inclusion and well-being (for example, sense of belonging and connectedness to school) for students with special educational needs.

## Communication

All communication is done in a respectful, timely and confidential manner and follows best practice guidelines in relation to data protection and school policies.

- **SEN Team**

The SEN team meets weekly in order to ensure best practice in relation to the support being provided to our students. These meetings can be formal or informal. In formal meetings, minutes are taken. There are also meetings with senior school management, meetings with external agencies, staff meetings, inservice training and staff training. Teachers will also link in with SETS regarding students' in class support.

- **SEN Register**

At the beginning of each academic year an SEN Student Register is compiled . This register includes details in relation to student's name, class and year, category of SEN, amount of support allocated, type of support provided. Teachers can access names of SEN students in their classes via our internal, confidential database.

- **Record Keeping**

All SEN records and individual SEN student files are kept in a secure file in the SEN Coordinator's office. Best practice guidelines in relation to data protection are followed.

- **Parents & Guardians**

Communication to parents is facilitated through our open day and information evenings, letters/phone calls/vsware texts to parents, student journal, parent-teacher meetings, meetings with the SEN coordinator/ team.

- **External Agencies**

Communication and meetings with external agencies e.g. NCSE are organised and attended as appropriate.

- **Parental Involvement**

Collaboration and sharing of relevant information between home and school are essential. Parents/Guardians through their unique knowledge of their own child have much to contribute to their child's learning. Parents/guardians should support their children and the school by ensuring that their child uses the skills and strategies that have been taught to them during supplementary teaching when doing homework etc. The school believes that the effectiveness of any assessment or intervention will be influenced by the involvement and interest of the child and his/her parents. Both the parents and the students have important and relevant information to offer. Parents are invited to contact the SEN department during the year in addition to meeting the SET teachers at Parent/Teacher Meetings. Parents are always contacted if a student is to be referred for assessment and afterwards to discuss the outcome of the assessment, the development of an appropriate learning programme and reviews of the same. Parents are expected to support the work of the school with the student and to ensure the correct use and maintenance of any aids or equipment that are provided for the student.

## Access to Psychological Reports

Individual files will be kept on each student. Information in the files includes psychological reports, results from entrance assessments, correspondence between the school, parents and other relevant agencies, and applications for support and concessions. Files are maintained by the SEN Coordinator and access is afforded to the following personnel - the School Principal, the Deputy Principal, members of the S.E.N. Department, the Year Heads and the Guidance Counsellors. Beyond these individuals, information regarding special needs is communicated to teachers on a need to know basis. In accordance with section 14.(1.d) of the EPSEN Act 2004, the school '*shall ensure that all relevant teachers and other relevant employees of the schools are aware of the S.E.N. of students*'. Information is provided to teachers in the form of an SEN summary document outlining the students strengths and needs and identifying targets for the student. These are accessed by teachers on the schools database which is GDPR compliant. Other newly identified students are notified to the teachers as the year progresses. This is the responsibility of the S.E.N coordinator.

## Reasonable Accommodations for State and In House Examinations (RACE)

Applications are made by the SEN team for RACE provision for students with SEN sitting a Junior Certificate or Leaving Certificate Examination. Accommodations are granted by The State Examinations Commission. From October 2016 the State Exams Commission SEC has operated a devolved model at both Junior and Leaving Cert Level. The school will make application for relevant accommodations for students who meet the criteria as laid down by the SEC at Junior Cycle and these accommodations can be reactivated for Leaving Cert. Further details are available in the RACE Guide for Exam Students at [www.examinations.ie](http://www.examinations.ie).

## Links with Outside Agencies and Services

The EPSEN Act (2004) assures interlinking provision between the National Council for Special Education Needs (NCSE), The National Education Welfare Board (NEWB), and the Health Executive and school. In accordance with this act, the school will work with the local S.E.N.O, the local N.E.P.S. psychologist, the Visiting Teachers for the Visually and the Hearing impaired, psychologists, or psychiatrists from the HSE and any other relevant professionals in providing an integrated response to the needs of any particular student. It may be necessary to hold case meetings with relevant professionals with the permission and knowledge of the student's parents (and their attendance) in order to determine the best approach and provision for the students in question. Notes from such meetings will be recorded and maintained in the student's file.

## **Appendix 1- The Continuum of Support**

**ACADEMIC  
COMPETENCE**

**SOCIAL, EMOTIONAL &  
BEHAVIOURAL  
COMPETENCE**



**Individualised &  
Specialist Support**

**School  
Support Plus  
(for a Few)**

**Response to Groups  
and Individuals**

**School Support  
(for Some)**

**Preventative  
& Proactive  
Approaches**

**Whole-School & Classroom Support  
(for All)**

**A Continuum of Support**

## Ratification and Communication

This policy has been ratified by the Board of Management.

Implementation Date 12th October 2020

This policy is in effect after being signed by the Board of Management

Signed Denis O'Shea Date 12/10/20

*Denis O'Shea*

Chairperson of Board of Management

*14/10/20*